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June 13, 1997

Faderal Communications Commission Office of Secretary

HAND DELIVER

William F. Caton Acting Secretary Federal Communications Commission Washington, D.C. 20554

ATTN: The Commission

RE: Petition For Reconsideration of the <u>Sixth Report</u> and <u>Order In MM Docket No. 87-268</u>, submitted by First Cullman Broadcasting, Inc., Licensee of Low Power Television Station W52BJ, Cullman, Alabama

Dear Mr. Caton:

Transmitted herewith on behalf of First Cullman Broadcasting, Inc. is an original and 11 copies of its "Petition for Reconsideration" filed in connection with the above-referenced rulemaking proceeding.

Should any questions arise concerning this matter, kindly contact the undersigned directly.

Respectfully submitted,

FIRST CULLMAN BROADCASTING, INC.

Joseph E. Dunne II

Attorney

JED:A22

xc: Michael Whipple

No. of Copies rec'd 11
List A B C D E

Before The FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of)
Advanced Television Systems	΄,
and Their Impact On) MM Docket No. 87-268
Existing Television Broadcast)
Services)

To: The Commission

PETITION FOR RECONSIDERATION

First Cullman Broadcasting, Inc. ("FCB"), licensee of low power television station W52BJ, Cullman, Alabama, by and through its undersigned attorney and pursuant to section 1.429 of the Commission's Rules and Regulations, 47 CFR § 1.429 (1997), hereby respectfully requests the Commission to reconsider its action in the above-captioned Report and Order, 62 FR 26684 (May 14, 1997), assigning channels 52 and 53, respectively, to WVTM-TV and WBIQ-TV, Birmingham, as their DTV assignments, and, instead, to assign channel 12 in lieu of channel 52 and channel 9 in lieu of channel 53, Birmingham, Alabama. In addition, FCB urges the Commission to require full service television stations whose DTV assignments will displace authorized LPTV stations to be required to keep the displaced LPTV stations accurately informed as to

their application and construction plans. As grounds for its petition, FCB shows and states as follows.

A. The Commission Proposal

In the Sixth Report and Order in MM Docket No. 87-268 (hereinafter "Sixth Report and Order") the Commission assigned, as DTV channels, channel 52 to WVTM-TV, Birmingham, Alabama, and channel 53 to WBIQ-TV, Birmingham, Alabama.

The Effect of the Commission's Proposal В.

2. As shown in the Engineering Statement attached in Exhibit 1, the transmitter sites for WVTM-TV and WBIQ-TV are only 47 miles from the W52BJ transmitter site. One of the basic assumptions of the DTV table of allocations is that the licensees' transmitter sites will remain the same. Because of the short distance between the transmitter sites at issue, and the lack of any intervening terrain obstructions, W52BJ will cause and receive interference from WVTM-TV and WBIQ-TV when those stations begin operating on their DTV channels. Should that occur, according to Commission rules, W52BJ will be required to cease operation. Moreover, given the crowded spectrum in Alabama because of the closeness of the Birmingham and Huntsville television markets, it is problematical, to say the least, to hope that there will be an available frequency which would permit W52BJ to resume operation as a displaced LPTV licensee. Moreover, given the tightness of spectrum in the area, W52BJ will be utterly dependent on WVTM-TV and WBIQ-TV to speedily apply for

their DTV channels to permit W52BJ to file a displacement

application while there are channels available. Given the Commission's Birmingham assignments, W52BJ's future is, at best, uncertain. Displacement is an expensive and time-consuming process requiring the licensee to, at a minimum, extensively alter its transmitter and to purchase a wholly new antenna. At the worst and in the more likely circumstance, W52BJ simply has no future.

C. The Licensee Counterproposal

There appear to be alternate channels available for assignment to Birmingham which would permit the continued operation of W52BJ on channel 52. See, Exhibit 1, page 1. According to the MSTV/NAB computer study, "Alternate DTV Channel Assignments in the Continental United States," dated May 28, 1997, DTV channel 12 could be assigned to WVTM-TV instead of channel 52, and channel 9 could be assigned to WBIQ-TV as its DTV assignment instead of channel 53. These alternate assignments can be made without disrupting or ending any LPTV service, and without effecting the remainder of the Commission's proposed DTV Table of Allotments. See, Exhibit 1, p. 1. Because the licensee has been unable to access the complex computer software necessary to make such studies, the licensee has not been able to make a detailed study of these proposed frequencies with respect to the replication of NTSC coverage, nor has it been able to calculate the interference areas between and among DTV and NTSC facilities. It should be noted here, however, that the MSTV/NAB study also shows that channels other than 9 and 12 could be assigned to

Birmingham without any adverse impact on the Commission's proposed table of DTV allocations.

D. The Public Interest

- 1. The Community of Cullman, Alabama
- Cullman is a community of over 29,000 located in 4. Cullman County, Alabama. Cullman County has a population of almost 70,000. See, Statement of Michael Whipple, Exhibit 2, p. No television station is licensed to Cullman, or any community in either Cullman County or the adjacent Blount County. Cullman is located at the outer fringes of both the Id. Huntsville and Birmingham television markets. Id. Accordingly, as a fringe community Cullman doesn't receive service from stations licensed to either television market. As W52BJ's general manager avers concerning Cullman, "we are noticed, if at all, only when a murder occurs." Id. It is fair to say, then, that Cullman and the surrounding communities are almost wholly bereft of any local television service, except, as will be shown below, that service which is provided by W52BJ.

2. The Station's Existing Broadcast Service

5. W52BJ went on the air on program test authority on September 4, 1994, and since then has been operating 24 hours a day, seven days a week. See, Exhibit 2, p. 1. The station's program schedule is heavily leavened with local productions, averaging between 15 to 20 hours per week of local programming. Id. That local programming includes a heavy dollop of local

sports programming, including the broadcast of Cullman High

School football games, and the "Cullman County Game of the Week" during football and basketball seasons. Exhibit 2, p. 2. These games feature two of the seven high schools in the Cullman county area each week. Id. The station features, on a regular basis, live local shows including: Cullman In the Morning, which features newsworthy local guests, such as elected officials, and which includes a local news segment which is the only televised local news in Cullman. Health First is a program produced in conjunction with the Cullman Regional Medical Center which uses Cullman medical professionals to promote health care and a healthy lifestyle. Exhibit 2, p. 3. The First Baptist Church Worship and From the Heart are locally produced religious programs. Id.

- 6. W52BJ also broadcasts a great deal of special event local programming. During the election season W52BJ provides live coverage of Cullman County election returns. W52BJ also broadcasts the Cullman County Fair Parade in Cullman, as well as providing taped coverage of the Cullman County Fair Queen Pageant. The Station also provides annual live coverage of the Cullman County Spelling Bee. Exhibit 2, p. 3. The station also provides coverage of charitable events such as the Olympic Torch Run as it passed through Cullman on its way to last year's Olympics in Atlanta. Id.
- 7. Largely because of its local programming the station was recognized as the FamilyNet national Affiliate of the Year in 1996.

- 3. Both Congress and the Commission Have Recognized that Protecting Existing LPTV Service Is In the Public Interest
- Both Congress and the Commission have recognized the 8. important role that LPTV stations, such as W52BJ, fulfill, particularly in providing television service to small and underserved communities such as Cullman. Congress has shown that it regards LPTV stations as providing an essential and unduplicated public service by legislating that LPTV stations were, under certain conditions, eligible, for the first time, for mandatory carriage status on local cable systems. See, 47 U.S.C. §614(h)(2). In providing for that protection, however, Congress also made clear that its intent was to protect LPTV stations that provided local service to underserved communities. Clearly W52BJ's service to Cullman, as described in greater detail above, more than satisfies both the letter and intent of the local service criteria set by Congress for mandatory carriage status. A more recent expression of Congress' recognition of the role LPTV stations play in providing broadcast service to a number of primarily rural Americans was contained in the introduction, on May 6, 1997, of the "Community Broadcasters Protection Act of 1997," H.R. 1539, a bill which would provide certain protection to LPTV stations broadcasting three hours of local programming per week, which had no less than 33 co-sponsors. If three hours of local programming is the Congressional benchmark for the provision of local service valuable enough to be legislatively protected, then how valuable can W52BJ's local service be

accounted, since it provides more than six times the amount of local programming per week which the legislation would establish as a benchmark.

Finally, the Sixth Report and Order itself also "recognized the benefits that low power television stations provide to the public." Sixth Report and Order In MM Docket No. 87-268, 62 FR 26684, ¶ 114. In the <u>Sixth Report and Order</u> the Commission made clear its stated purpose to adopt a table of DTV allocations which would "minimize the impact on LPTV stations." Sixth Report and Order, supra, ¶ 142. By the adoption of FCB's allocation proposals the Commission has the opportunity to further both the objectives of the Sixth Report, providing for maximum DTV coverage while protecting what is clearly a valuable broadcast station providing a needed local service to an underserved community. Not only is the W52BJ service which would be protected local, it serves a community that would be utterly bereft of local television service without the service provided by W52BJ. Such local service the community has come to both expect and depend upon. Moreover, because alternate channels are available for assignment as DTV channels to Birmingham the Commission has an opportunity to "minimize the impact" of DTV on at least one LPTV station. Adoption of FCB's proposal does not provide inferior channels to either WVTM-TV or WBIQ-TV, and protects a valuable local broadcast service from, at a minimum, disruption, and, possibly, extinction. The people of Cullman have a right to expect that they can continue to receive what is

a valuable local service, particularly when the service can be protected by the Commission at so little cost. Clearly the public interest is best served by protected the existing, unduplicated and meritorious local service provided by W52BJ.

- E. Simple Justice Requires That TV Licensees Keep LPTV
 Licensees Threatened By Displacement Informed of Their Plans
 Concerning Utilization of the DTV Channel
- Despite its best efforts, the Commission admitted in the Sixth Report and Order that some existing LPTV stations would be required to be displaced if each television station were to receive a DTV channel. Sixth Report and Order in MM Docket No. 87-268, ¶ 114. Given this admitted eventuality, many existing LPTV licensees which have made a substantial investment in equipment and studio facilities are threatened with a substantial, perhaps total loss of their investment should they be displaced by a full power licensee commencing operation on its DTV channel. The Commission recognizes that even with the relaxed displacement procedures it adopted that there were some LPTV licensees which were not going to be able to find a frequency upon which they could continue to operate. The problem is made even more acute by the fact that many LPTV licensees are nonprofit community organizations dependent on community support and lacking substantial financial resources or the ability to raise funds in a short period of time. Especially for nonprofit community licensees a long lead time for planning and raising funds may be essential to successfully dealing with a DTV displacement.

- This uncertainty facing many LPTV licensees is 11. exacerbated by the fact that the Commission's DTV rules contain no requirement that TV licensees, whose construction plans may have such a devastating impact on an LPTV station, are under no obligation to inform LPTV licensee of their plans or proposed construction schedule. Without reliable information concerning the television station's plans LPTV station's are unable to make intelligent plans of their own. For example, with no idea of when a television station wil activate its DTV channel the LPTV licensee cannot make an informed judgement concerning whether there is likely to be a frequency available when it must seek a new channel on which to continue operating. Moreover, because many LPTV licensees are nonprofit community organizations, these licensees often require long lead times to generate the sort of funding commitments necessary to finance a project as expensive as changing a station's channel, with all the construction necessary to complete such a project.
- 12. Accordingly, to ease the disruption and financial hardship that the operation of the assigned DTV channels will likely cause LPTV licensees, the Commission should require television licensees, once they are informed by an LPTV licensee that the LPTV licensee is threatened by displacement should they activate their assigned DTV channel, to provide timely and accurate information to the effected LPTV licensee concerning their application and construction plans as it relates to their DTV assignment.

F. Conclusion

Cullman and Cullman County comprise communities with little or no local broadcast service. W52BJ is a licensee with a solid record of providing an average of 15 to 20 hours per week of local program service. That local programming has run the gamut from local sports programming to talk shows to religious programming. W52BJ during its time on the air has been a good citizen and provided its community with both local news and local public affairs programming. The station has a consistent record of broadcasting local events of significance to the community-events which affirm the identity and vitality of the community and its residents. FCB's proposed alternate channels are in no way technically or otherwise inferior to the channels assigned by the Commission, and do not disrupt the Commission's proposed table of allocations in any way. Adopting FCB's counterproposal will protect the outstanding local broadcast service that the residents of Cullman and Cullman County have come to depend on from W52BJ. The adoption of the allocations proposed here will further the policy objectives of the Sixth Report and Order and preserve a valuable community resource. The public interest is clearly served by the adoption of the alternate channels herein proposed. In addition, simple justice requires that TV licensees, upon request, provide potentially displaced LPTV licensees with timely and accurate information concerning the television licensee's plans to active its DTV channel.

WHEREFORE, the foregoing considered, First Cullman Broadcasting, Inc. respectfully requests the Commission to reconsider its action assigning channels 52 and 53 to WVTM-TV and WBIQ-TV, Birmingham, and, instead, assigning channels 12 in lieu of channel 52 and 9 in lieu of channel 53.

Respectfully Submitted,

FIRST CULLMAN BROADCASTING, INC.

Ву

Joseph E. Dunne II

tts Attorney

JOSEPH E. DUNNE III Attorney At Law 150 E. Ninth Street Suite 300 Durango, CO 81301 (970) 385-7312

ORIGINAL

FIRST CULLMAN BROADCASTING, INC.

EXHIBIT 1

ENGINEERING STATEMENT

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of FIRST CULLMAN BROADCASTING, INC. ("FCB"), licensee of Low-Power Television Station W52BJ, Channel 52, Cullman, Alabama, in support of its Petition for Reconsideration of the Commission's Sixth Report and Order in MM Docket No. 87-268 concerning the implementation of digital television (DTV) service.

In this proceeding the FCC assigned DTV channels to all eligible full-service television stations in the United States. However, in doing so, the Commission assigned DTV Channel 52 to WVTM-TV, Birmingham, and DTV Channel 53 to WBIQ-TV, also Birmingham. These stations are 47 miles from the W52BJ transmitter site. At such distance W52BJ will cause interference to and receive interference from these two DTV facilities. As a result, the operation of either DTV station will force W52BJ to cease operation on Channel 52. Should no alternative LPTV channel be available in Cullman, W52BJ will have to shut down entirely.

There do appear to be alternative DTV channels that could be assigned to WVTM-TV and WBIQ-TV. According to an MSTV/NAB computer study, "Alternative DTV Channel Assignments in the Continental United States," dated May 28, 1997, DTV Channel 12 could be assigned to WVTM-TV, and DTV Channel 9 could be assigned to WBIQ-TV. These assignments can be made without displacing any LPTV or TV translator facility and without affecting the rest of the FCC's DTV Table of Allotments. Further, the MSTV/NAB study identified several other alternative channels for WVTM-TV and WBIQ-TV.

It must be noted that we did not conduct a detailed study of these alternative DTV channels with respect to replication of NTSC coverage, nor did we calculate interference areas between and among DTV and NTSC facilities, since the complex computer software that the FCC used to generate its proposed Table of Allotments is not accessible to the public. Therefore, further study of FCB's proposed alternative allotments may be required, or other alternative channels may be found to be better substitutes than those requested herein.

For now, based upon the information at hand, it is requested that the Commission assign DTV Channel 12 to WVTM-TV, Birmingham, and DTV Channel 9 to WBIQ-TV, Birmingham. This action is clearly in the public interest, since it protects the viewers of W52BJ from the loss of valued programing, and at the same time assists the FCC's implementation of the new DTV service in Birmingham. The Commission has stated that a goal of this proceeding is to minimize the impact of DTV on the LPTV and television translator segment of the broadcasting industry. Adoption of these alternative channels for WVTM-TV and WBIQ-TV would do just that.

I declare under penalty of perjury that the foregoing statements are true and correct

to the best of my knowledge and belief.

KEVIN T. FISHER

June 11, 1997

FIRST CULLMAN BROADCASTING, INC.

EXHIBIT 2

VERIFIED STATEMENT OF MICHAEL WHIPPLE

VERIFIED STATEMENT

- I, Michael W. Whipple, hereby affirm that the following statement is made under penalty of perjury of the laws of the United States and the State of Alabama, and is true and correct.
- 1. I am the General Manager of low power television station W52BJ, Cullman, Alabama. I have served in that capacity since the station went on the air on program test authority on September 4, 1994.
- Cullman, our community of license, is a community of over 2. 29,000 located in Cullman County, Alabama. Cullman county has a population of almost 70,000. No television station is licensed to Cullman, or any community in Cullman county, or, for that matter, in the adjoining Blount county. Cullman is considered to be in the Birmingham television market, but Cullman is in somewhat of a unique position. It is in the Birmingham television market, although it is on the very fringe of that market, but it is also equi-distant from Huntsville, Alabama. About half of our residents who commute to work commute to Birmingham, the other half commute to Huntsville. Being equi-distant from and on the very fringe of two television markets has the result that we are ignored by television stations in two television markets. Stations in neither of these television markets cover local events in Cullman or Cullman County on a consistent basis, and we are noticed, if ever, only when a murder occurs.
- 3. We filed an application for an LPTV station in 1993, and we began broadcasting on September 4, 1994. We have now been onthe-air for 24 hours a day, 7 days a week for over two years. We

are carried on two cable systems in Cullman county, and on one cable system in adjoining Blount county. We believe we are providing a valuable local service to Cullman, and to residents of the Cullman County. We are even providing broadcast service to areas of Blount county.

- 4. The main attraction to our programming is its local content. A current schedule of our programming is included in Attachment A. W52BJ averages between 15 to 20 hours of local programming per week. We just finished our second season broadcasting Cullman High School football games. Game broadcasts include interviews with the Head Coach and game highlights. We also broadcast the "Cullman County Game of the Week" during both football and basketball seasons. These game broadcasts feature two of the seven high schools in the Cullman county area.
- 5. During the over two years that we have served Cullman, we have produced and broadcast a number of local community productions. These broadcasts included local pageants and community events, local parades, and local election coverage. We try to be a responsible citizen and to educate and inform local voters. W52BJ always provides live coverage of Cullman county election returns. Every year the station broadcasts, live, the popular Cullman County Fair Parade in Cullman. We also provide taped coverage of the Cullman County Fair Queen Pageant. Because we like to instill pride in achievement in our children, we also broadcast, annually, the Cullman County Spelling Bee. On occasion we provide broadcast coverage of charitable events such as the

Olympic Torch Run through Cullman on its way to last year's Olympics in Atlanta.

- W52BJ is proud of the fact that it produces and broadcasts a number of local program productions each week, in addition to the sports programming mentioned above. Our flagship program is Cullman In The Morning, which is broadcast daily at 7 a.m.; 6 p.m. and 10 p.m. This program features newsworthy local quests, such as elected officials, community and business leaders, students, teachers, leaders and representatives of civic and fraternal organizations, etc. The show also includes a local news segment that is the only local news broadcast over a TV station in Health First is a program produced in conjunction with Cullman Regional Medical Center to promote health care and healthy lifestyles to Cullman residents. The program features, as regular guests, Cullman doctors, nurses, technicians and other health care professionals. The program is produced at the hospital. Baptist Church Worship is a live local worship service broadcast on Sunday, and From the Heart is a bible study program produced by a local ministry.
- 7. Largely because of our local programming First Cullman Broadcasting, Inc. was recognized as the FamilyNet national Affiliate of the Year in 1996.
- 8. At W52BJ we are proud of the service that we provide to the community. We believe that we provide our community with a local voice that it was lacking. The community has a greater sense of itself, and a greater knowledge of its resources because of our

Hervice. We believe it would be a great blow, and a result directly contrary to the public interest, were our local community service to be ended because of the theoretical benefits of DTV service. We are providing a needed service now that will not be duplicated by stations licensed to other communities. That record of service should be honored, and our existing broadcast service protected.

Muld W. Whipple

Michael W. Whipple

Executed this $12^{\frac{+1}{2}}$ day of June, 1997.

ATTACHMENT A PROGRAM SCHEDULE

TV-52 Programming Guide June 1997

CST		SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY		сѕт
5:00	AM	Living By the Word		=====	Real McCoys			Beverly Exercise	MA	5:00
5:30		Christian Wld. News			You Need to Know			Paul Gaudino Exercise]	5:30
6:00		Dave Breese			Beverly Exercise			Plant Groom	1	6:00
6:30		The Lesson	Cross Training		Cross Training		Cross Training	Date with the Angels	7	6:30
7:00		PowerPoint	PORTE STREET,					Flying House	1	7:00
7:30			Cultural in thicklorator (Con)					Brentwood Kids	1	7:30
8:00			Life Lessons with Ron Hembree Home Life				Kids Like You	1	8:00	
8:30		In Touch Charles Stanley						Camp Cariboo	1	9:30
9:00			It's Time for Herman and Sharon					1	9:00	
]] }		Come Alive Nelson Price	Bible and Life	Crossview	Gateway to Truth	Portrait of Marriage	How Can I Live	Sunshine Factory Gerbert	1	9:30
9:30			Young at Heart	The Lesson	Dave Breese	Marriage & Family	<u> </u>		┨	10.00
10:00		handanianan sanan ayan gaga sanan Bandanian		Just Kids	4					
10:30			L					Kingdom Adventure	-	10:30
11:00		First Burght Claim (178)		1 16.	Just For Parents			Bonanza	1	11:00
11:30	Marine et al.			Life	Lessons with Ron Hen	nbree		Stable of the formula.	Managed by	200000000
12:00		Pathway to Victory	The 700 Club				Fishing University		12:00	
12:30		Quentin Road						Larry Nixon Fishing		12:30
1:00		Crystal Cathedral Robert Schuller			Life Today	T		Fishing N. America		1:00
1:30				Fran Begger Cinger:	Variety	Variety	Financia Bur	Sports Variety	-	1:30
2:00		Crosstalk	Dobie Gillis		Dobie Gillis	Dobie Gillis	Dobie Gillis	Faulk's Outdoors Ultimate Deer & Turkey		2:00
2:30		Orlgins		Ozzie and Harriet						2:30
3:00			Super Book					Sports Variety		3:00
3:30		Animal Adventures			Flying House	т		Classic Adventures		3:30
4:00		Carter Report	Camp Cariboo	Just Kid's	Brentwood Kids	Kingdom Adventures	Gerbert	Country Crossroads		4:00
4:30		Life Matters	Kids Like You	Sunshine Factory	Sunshine Factory	Sunshine Factory	Camp Cariboo	At the Stage Door		4:30
5:00	lina.	Your New House	Pet Care Magazine	Bonanza	Portrait of Marraige	Animal Doctor	Plant Groom	Southern Stage		5:00
5:30			Just for Parents		Just for Parents	Sports Week	Capital News	Clark Family		5:30
6:00			Culmacen the Morning (Replay)					ĺ		6:00
6:30					The American Times		,	Family		6:30
7:00	Baptist Hour		Real McCoys	Menane III	Real McCoys	Bonanza	Real McCoys	Theatre		7:00
7:30		Frank Pollard	Danny Thomas	Trey ster	Mother's In Law		Best of Groucho			7:30
B:00		Day of Discovery	You Need to Know		A HOLDS	Tion the Heat	Your New House	CCM		8:00
8:30		Encouraging Word	Home Life	Home Life	Home Life	Animal Adventures	Report From the House,	Weekend Jam		6:30
9:00		In Reality		PowerPoint	Quentin Road	Invitation	Family	Family		9:00
9:30		Hope for Today		In Search	Bible Hour	To Life	Enrichment Series	Showcase		9:30
10:00		God's News Callman in the Homing (Répary)								10:00
10:30		Hoty Land Now & Then The American Times						from Teens		10:30
11:00		Gospel	CCM	Just the Facts	Clark Family	At the Stage Door	Night Light	In Your Face		11:00
11:30		Soundstage	Weekend Jam	Night Light	Southern Stage	Country Crossroads	Bottom Line	Believe		11:30
12:90	AM	Straight Talk from		Act It Out	AM	12:00				
12:30	J	Teens				12:30				
1:00		Bonanza	COPE					Solid Rock VDO	1 1	1:00
1:30	l l		OUTE				Solid Rock VDO		1:30	
2:00	į	Crosstalk	FaithPrints	Family Showcase	Family Enrichment	Gaither Homecoming	Straight Talk From Teens	Family	}	2:00
2:30		Central Message	L WHILL LEUCS							2:30
3:00		Page Two		Theater		3:00				
3:30		Christian World News	FamilyNet Movie Classics Dobie Gillis							3:30
4:00		Prophecy in News						Joy of Music		4:00
4:30	- [Holy Land Now & Then						Day of Discovery		4:30

CST - Central Standard Time

■ DENOTES LOCAL PROGRAM

Program Schedule Subject To Change Without Notice

CULLMAN'S TELEVISION STATION! UHF Channel 52

Century Cable Channel 23, Good Hope Cable Channel 30, Oneonta Cable TV Channel 41